

# Statement of Basis of the Federal Operating Permit

ETC Texas Pipeline, Ltd.

Site Name: Waha Gas Plant  
Physical Location: 2821 Waha Rd  
Nearest City: Cozanosa  
County: Pecos

Permit Number: O2546  
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 211130  
NAICS Name: NATURAL GAS EXTRACTION

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: April 26, 2019

## Operating Permit Basis of Determination

### Permit Area Process Description

Inlet gas goes through an inlet separator where water and condensate are removed. The field gas is then compressed by internal combustion engine-driven compressors. The water and condensate that were removed from the field gas are stored in condensate storage tanks. The plant consists of compressor engines and turbines to boost the pressure of the gas, TEG and mole sieve dehydration units to remove excess water from the gas, a cryogenic plant to separate methane and natural gas liquids from the raw gas, and an amine treatment unit to remove CO<sub>2</sub> and H<sub>2</sub>S from the inlet gas. The recovered acid gas is re-injected into geologic strata

### FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO <sub>2</sub> , NO <sub>x</sub> , CO
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### Reading State of Texas’s Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield

- New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list

## General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

## Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a

specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

**Permit Shield.** A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

**New Source Review Authorization References.** All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

**Compliance Plan.** A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

**Alternative Requirements.** This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

**Acronym list.** This attachment lists the common acronyms used when discussing the FOPs.

#### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

The applicant opted to comply with the more stringent 20% opacity standard under 30 TAC § 111.111(a)(1)(B) for all stationary vents that are subject to the 30% opacity standard under 30 TAC § 111.111(a)(1)(A).

### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO <sub>2</sub> Trading Program)	No

### **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

## Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

## Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
CAT-53	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
CAT-53	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-3	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = 4 stroke spark ignited rich burn engine</p>	
CAT-65	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
CAT-65	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Operating Hours = The stationary RICE is operated more than 24 hours per calendar year.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after December 19, 2002, but before June 12, 2006.</p> <p>Control Technique = Oxidation catalyst</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited lean burn engine.</p>	
CAT-66	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
CAT-66	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Operating Hours = The stationary RICE is operated more than 24 hours per calendar year.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after December 19, 2002, but before June 12, 2006.</p> <p>Control Technique = Oxidation catalyst</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited lean burn engine.</p>	
CAT-67	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
CAT-67	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Operating Hours = The stationary RICE is operated more than 24 hours per calendar year.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after December 19, 2002, but before June 12, 2006.</p> <p>Control Technique = Oxidation catalyst</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited lean burn engine.</p>	
CAT-68A	40 CFR Part 60, Subpart JJJJ	60JJJJ-1	<p>Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006.</p> <p>Manufactured Date = Date of manufacture is on or after July 1, 2010.</p> <p>Test Cell = The SI ICE is not being tested at an engine test cell/stand.</p> <p>Certified = Purchased a non-certified SI ICE.</p> <p>Exemption = The SI ICE is not exempt.</p> <p>Temp Replacement = The SI ICE is not acting as a temporary replacement.</p> <p>Horsepower = Maximum engine power greater than or equal to 1350 HP.</p> <p>Fuel = SI ICE that uses natural gas.</p> <p>Service = SI ICE is a non-emergency engine.</p> <p>Commencing = SI ICE that is commencing new construction.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
CAT-68A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
CAT-69	40 CFR Part 60, Subpart JJJJ	60JJJJ-1	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006. Manufactured Date = Date of manufacture is on or after July 1, 2010. Test Cell = The SI ICE is not being tested at an engine test cell/stand. Certified = Purchased a non-certified SI ICE. Exemption = The SI ICE is not exempt. Temp Replacement = The SI ICE is not acting as a temporary replacement. Horsepower = Maximum engine power greater than or equal to 500 HP and less than 1350 HP. Fuel = SI ICE that uses natural gas. Service = SI ICE is a non-emergency engine. Lean Burn = The SI ICE is a lean-burn engine. Commencing = SI ICE that is commencing new construction.	
CAT-69	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
FLASHCOM P	40 CFR Part 60, Subpart JJJJ	60JJJJ-1	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006. Manufactured Date = Date of manufacture is on or after July 1, 2010. Test Cell = The SI ICE is not being tested at an engine test cell/stand. Certified = Purchased a non-certified SI ICE. Exemption = The SI ICE is not exempt. Temp Replacement = The SI ICE is not acting as a temporary replacement. Horsepower = Maximum engine power greater than or equal to 1350 HP. Fuel = SI ICE that uses natural gas. Service = SI ICE is a non-emergency engine. Commencing = SI ICE that is commencing new construction.	
FLASHCOM P	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than 500 HP.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
WAU25	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
WAU25	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-2	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Operating Hours = The stationary RICE is operated more than 24 hours per calendar year.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Control Technique = Non-selective catalytic reduction</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited rich burn engine.</p>	
WAU26	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
WAU26	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-2	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Operating Hours = The stationary RICE is operated more than 24 hours per calendar year.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Control Technique = Non-selective catalytic reduction</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited rich burn engine.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
WHITE-6	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
WHITE-6	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-2	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Operating Hours = The stationary RICE is operated more than 24 hours per calendar year.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Control Technique = Non-selective catalytic reduction</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited rich burn engine.</p>	
GRP-COND	40 CFR Part 60, Subpart Kb	60Kb	<p>Product Stored = Petroleum (other than crude oil) or condensate stored, processed, and/or treated prior to custody transfer</p> <p>Storage Capacity = Capacity is less than or equal to 420,000 gallons (1,589,874 liters)</p>	
FURNACE-1	40 CFR Part 60, Subpart Dc	60Dc	<p>Construction/Modification Date = After June 9, 1989 but on or before February 28, 2005.</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>SO<sub>2</sub> Inlet Monitoring Type = No SO<sub>2</sub> monitoring.</p> <p>Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p> <p>SO<sub>2</sub> Outlet Monitoring Type = No SO<sub>2</sub> monitoring.</p> <p>Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).</p> <p>Technology Type = None.</p> <p>D-Series Fuel Type = Natural gas.</p> <p>47C-Option = COMS exemption § 60.47c(c) for a facility burning only distillate oil containing 0.5 % or less by weight sulfur and/or liquid or gaseous fuels with potential SO<sub>2</sub> emission rates of no more than 26 ng/J (0.060 lb/MMBtu), no post-combustion technology</p> <p>ACF Option - SO<sub>2</sub> = Other ACF or no ACF.</p> <p>ACF Option - PM = Other ACF or no ACF.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
STAB-HTR	40 CFR Part 60, Subpart Dc	60Dc-1	<p>Construction/Modification Date = After February 28, 2005.</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>SO2 Inlet Monitoring Type = No SO<sub>2</sub> monitoring.</p> <p>Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p> <p>SO2 Outlet Monitoring Type = No SO<sub>2</sub> monitoring.</p> <p>Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).</p> <p>Technology Type = None.</p> <p>D-Series Fuel Type = Natural gas.</p> <p>47C-Option = COMS exemption § 60.47c(e) for a facility not using post-combustion technology (except a wet scrubber), burns only gaseous fuels or fuel oils that contain no more than 0.5 % by weight sulfur, and emissions of CO are 0.15 lb/MMBtu average.</p> <p>ACF Option - SO2 = Other ACF or no ACF.</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.</p>	
FLARE 70	30 TAC Chapter 111, Visible Emissions	R1111-002	<p>Acid Gases Only = Flare is used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Construction Date = Newest source routing emissions to the flare began construction after January 31, 1972.</p>	
FLARE 70	40 CFR Part 60, Subpart A	60A	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.	
FLARE 70	40 CFR Part 63, Subpart A	63A	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	
FLARE-19	30 TAC Chapter 111, Visible Emissions	R1111-001	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Construction Date = Newest source routing emissions to the flare began construction on or before January 31, 1972.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
FLARE-19	40 CFR Part 60, Subpart A	60A	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.	
FLARE-19	40 CFR Part 63, Subpart A	63A	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	
PROACIDG AS	30 TAC Chapter 112, Sulfur Compounds	R112	Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery.	
PROACIDG AS	40 CFR Part 60, Subpart LLL	60LLL-1	Onshore = The sweetening unit is located onshore at a gas processing plant. Construction Date = After January 20, 1984 and on or before August 23, 2011. Acid Gas Vented = Acid gas is vented (acid gas is not completely reinjected into oil- or gas-bearing strata or is otherwise released into the atmosphere [burning is considered to be a release into the atmosphere]). Design Capacity = Design capacity is less than 2 long tons/day.	
CENTAUR-1	40 CFR Part 60, Subpart GG	60GG-1	NO <sub>x</sub> Control Method = No NO <sub>x</sub> control method is used. Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr). Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004. NO <sub>x</sub> Allowance = The owner or operator is not electing to use a NO <sub>x</sub> allowance in determining emission limits in 40 CFR § 60.332(a). NO <sub>x</sub> Monitoring Method = No continuous monitoring system is used. Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel. Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam. Fuel Type Fired = Natural gas meeting the definition in § 60.331(u). Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG. Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation. Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage. Turbine Combustion Process = Combustion process is diffusion flame combustion. Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.	
CENTAUR-2B	40 CFR Part 60, Subpart GG	60GG-1	NO <sub>x</sub> Control Method = No NO <sub>x</sub> control method is used. Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr). Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004. NO <sub>x</sub> Allowance = The owner or operator is not electing to use a NO <sub>x</sub> allowance in determining emission limits in 40 CFR § 60.332(a).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG.</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Turbine Combustion Process = Combustion process is diffusion flame combustion.</p> <p>Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.</p>	
SATURN-4B	40 CFR Part 60, Subpart GG	60GG-1	<p>NOx Control Method = No NO<sub>x</sub> control method is used.</p> <p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.</p> <p>NOx Allowance = The owner or operator is not electing to use a NO<sub>x</sub> allowance in determining emission limits in 40 CFR § 60.332(a).</p> <p>NOx Monitoring Method = No continuous monitoring system is used.</p> <p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG.</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Turbine Combustion Process = Combustion process is diffusion flame combustion.</p> <p>Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.</p>	
GRP-FUG	40 CFR Part 60, Subpart KKK	60KKK-001	<p>2% Valves Leaking = The owner or operator is not electing to comply with an allowable percentage of valves leaking equal to or less than 2.0 percent.</p> <p>Closed Vent Systems = Closed-vent systems addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Facility Type = Affected facility is the group of all equipment except compressors within a process unit.</p> <p>Heavy Liquid Service = Pump in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p>	Grouped citation [G]§60.636 was added to reporting requirements for pressure relief devices in gas/vapor service. Reporting citations §60.636(a), §60.636(b), and [G]§60.636(c) were deleted from pressure relief devices in gas/liquid service.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Light Liquid Service = Pressure relief device in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Open-Ended Valves or Lines = Open-ended valves or lines addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Vacuum Service = No component in vacuum service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Vapor Recovery System = No vapor recovery system addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>AMEL = Not using alternate means of emission limitation.</p> <p>Complying with § 60.482-10 = Complying with 40 CFR 60.482-10.</p> <p>Construction/Modification Date = After January 20, 1984 and on or before August 23, 2011.</p> <p>Gas/Vapor Service = Valves in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Non-VOC or Non-Wet Gas Service = No component in non-VOC or non-wet gas service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>AMEL = Not using alternate means of emission limitation.</p> <p>Facility Covered by 40 CFR Part 60, Subparts VV or GGG = Facility not covered by NSPS Subpart VV or Subpart GGG or NESHAP Subpart V.</p> <p>Light Liquid Service = Pump in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>AMEL = Not using alternate means of emission limitation.</p> <p>Complying with § 60.482-6 = Complying with 40 CFR 60.482-6.</p> <p>Complying with § 60.482-8 = Complying with 40 CFR 60.482-8.</p> <p>Compressors = Compressor in VOC or Wet Gas Service.</p> <p>Enclosed Combustion Device = No enclosed combustion device addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Complying with § 60.482-7 = Complying with 40 CFR 60.482-7.</p> <p>Control Devices Used to Comply With AMEL = No control devices used to comply with AMEL.</p> <p>Flanges and Other Connectors = Flanges or other connectors addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Gas/Vapor Service = Pressure relief device in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Heavy Liquid Service = Pressure relief device in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>Reciprocating Compressor in Wet Gas Service = Reciprocating compressor in wet gas service.</p> <p>AMEL = Not using alternate means of emission limitation.</p> <p>Complying with § 60.482-2 = Complying with 40 CFR 60.482-2.</p> <p>Light Liquid Service = Valves in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.</p> <p>AMEL = Not using alternate means of emission limitation.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Flare = Flare control device addressed in 40 CFR 60 (NSPS) Subpart KKK.</p> <p>Complying with § 60.482-3 = Complying with 40 CFR 60.482-3.</p> <p>Complying with § 60.482-4 = Complying with 40 CFR 60.482-4.</p> <p>Complying with § 60.482-8 = Complying with 40 CFR 60.482-8.</p> <p>Complying with § 60.482-10 = Flares are complying with the requirements of § 60.482-10.</p> <p>Complying with § 60.482-7 = Complying with 40 CFR 60.482-7.</p>	
STABFUG	40 CFR Part 60, Subpart KKK	60KKK	<p>Facility Type = Affected facility is the group of all equipment except compressors within a process unit.</p> <p>Construction/Modification Date = After August 23, 2011.</p>	
STABFUG	40 CFR Part 60, Subpart OOOOa	60OOOOA	<p>Construction/Reconstruction/Modification Date = After September 18, 2015.</p> <p>Affected Facility Type = Group of equipment within a process unit, other than a compressor, not subject to 40 CFR Part 60, Subparts VVa, GGG or GGGa.</p>	
GLYVENT-17B	40 CFR Part 63, Subpart HH	63HH	<p>Alternate Means of Emission Limitation (AMEL) = The EPA Administrator has not approved an alternate means of emission limitation in accordance with 40 CFR § 63.777 or no alternate has been requested.</p> <p>Control Device Type = Flare.</p> <p>HAP Source = Stationary of source of HAPs that is not a major source as defined in 40 CFR § 63.761.</p> <p>Affected Source Type = Triethylene glycol (TEG) dehydration unit not located within an UA plus offset and UC boundary.</p> <p>Sealed Closed Vent System = The closed-vent system contains no joints, seams, or other connections.</p> <p>Area Source Exemption = Actual average emissions of benzene from the TEG unit process vent are less than 0.90 megagrams per year.</p> <p>Unsafe to Inspect = No parts of the closed-vent system are designated as unsafe to inspect.</p> <p>Difficult to Inspect = No parts of the closed-vent system are designated as difficult to inspect.</p>	

\* - The "unit attributes" or operating conditions that determine what requirements apply

\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the "as applicable" language. The "as applicable" language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

### New Source Review Authorization References

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 74857	Issuance Date: 03/23/2017
Authorization No.: 92327	Issuance Date: 04/21/2016
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.352	Version No./Date: 09/04/2000
Number: 106.359	Version No./Date: 09/10/2013
Number: 106.492	Version No./Date: 09/04/2000
Number: 106.512	Version No./Date: 09/04/2000
Number: 106.512	Version No./Date: 06/13/2001

### **New Source Review Authorization References**

Number: 6	Version No./Date: 05/04/1994
Number: 66	Version No./Date: 11/05/1986
Number: 66	Version No./Date: 08/30/1988
Number: 66	Version No./Date: 07/20/1992

### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

### **Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected**

#### **Compliance Assurance Monitoring (CAM):**

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;

2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: WAU25	
Control Device ID No.: NSCR-WAU25	Control Device Type: Catalytic Converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 106, Permits by Rule	SOP Index No.: 64CAM-0003
Pollutant: NO <sub>x</sub>	Main Standard: 106.512
Monitoring Information	
Indicator: Inlet Gas Temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Inlet gas temperature that is greater than 1250 degrees Fahrenheit or less than 750 degrees Fahrenheit shall be considered and reported as a deviation.	
Basis of CAM: A common way to reduce NO <sub>x</sub> emissions is by the use of a catalytic converter. A catalytic converter uses a catalyst such as platinum and rhodium to reduce the NO <sub>x</sub> emissions. When an NO or NO <sub>2</sub> molecule contacts the catalyst, the catalyst frees oxygen and allows the formation of N <sub>2</sub> in lieu of NO <sub>x</sub> . Parameters that may be measured to determine control device performance include the outlet NO <sub>x</sub> concentration, the inlet temperature of the catalyst and the oxygen concentration in the exhaust gas.	

<b>Unit/Group/Process Information</b>	
ID No.: WAU25	
Control Device ID No.: NSCR-WAU25	Control Device Type: Catalytic Converter
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 106, Permits by Rule	SOP Index No.: 64CAM-0003
Pollutant: NO <sub>x</sub>	Main Standard: 106.512
<b>Monitoring Information</b>	
Indicator: Oxygen Concentration	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Oxygen concentration sensor voltage reading at inlet of catalyst that is less than 0.61 volts or greater than 0.99 volts shall be considered and reported as a deviation.	
Basis of CAM: A common way to reduce NO <sub>x</sub> emissions is by the use of a catalytic converter. A catalytic converter uses a catalyst such as platinum and rhodium to reduce the NO <sub>x</sub> emissions. When an NO or NO <sub>2</sub> molecule contacts the catalyst, the catalyst frees oxygen and allows the formation of N <sub>2</sub> in lieu of NO <sub>x</sub> . Parameters that may be measured to determine control device performance include the outlet NO <sub>x</sub> concentration, the inlet temperature of the catalyst and the oxygen concentration in the exhaust gas.	

<b>Unit/Group/Process Information</b>	
ID No.: WAU26	
Control Device ID No.: NSCR-WAU26	Control Device Type: Catalytic Converter
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 106, Permits by Rule	SOP Index No.: 64CAM-0003
Pollutant: NO <sub>x</sub>	Main Standard: 106.512
<b>Monitoring Information</b>	
Indicator: Inlet Gas Temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Inlet gas temperature that is greater than 1250 degrees Fahrenheit or less than 750 degrees Fahrenheit shall be considered and reported as a deviation.	
Basis of CAM: A common way to reduce NO <sub>x</sub> emissions is by the use of a catalytic converter. A catalytic converter uses a catalyst such as platinum and rhodium to reduce the NO <sub>x</sub> emissions. When an NO or NO <sub>2</sub> molecule contacts the catalyst, the catalyst frees oxygen and allows the formation of N <sub>2</sub> in lieu of NO <sub>x</sub> . Parameters that may be measured to determine control device performance include the outlet NO <sub>x</sub> concentration, the inlet temperature of the catalyst and the oxygen concentration in the exhaust gas.	

<b>Unit/Group/Process Information</b>	
ID No.: WAU26	
Control Device ID No.: NSCR-WAU26	Control Device Type: Catalytic Converter
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 106, Permits by Rule	SOP Index No.: 64CAM-0003
Pollutant: NO <sub>x</sub>	Main Standard: 106.512
<b>Monitoring Information</b>	
Indicator: Oxygen Concentration	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Oxygen concentration sensor voltage reading at inlet of catalyst that is less than 0.61 volts or greater than 0.99 volts shall be considered and reported as a deviation.	
Basis of CAM: A common way to reduce NO <sub>x</sub> emissions is by the use of a catalytic converter. A catalytic converter uses a catalyst such as platinum and rhodium to reduce the NO <sub>x</sub> emissions. When an NO or NO <sub>2</sub> molecule contacts the catalyst, the catalyst frees oxygen and allows the formation of N <sub>2</sub> in lieu of NO <sub>x</sub> . Parameters that may be measured to determine control device performance include the outlet NO <sub>x</sub> concentration, the inlet temperature of the catalyst and the oxygen concentration in the exhaust gas.	

**Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: CENTAUR-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO <sub>x</sub>	Main Standard: § 60.332(a)(2)
Monitoring Information	
Indicator: NO <sub>x</sub> Concentration	
Minimum Frequency: Monthly - 4 consecutive months with no deviations, then; Semiannually - 2 monitoring periods with no deviations (monthly monitoring resumes if a deviation is noted), then; Annually (monthly monitoring resumes if a deviation is noted).	
Averaging Period: N/A	
Deviation Limit: NO <sub>x</sub> > 165 ppmvd at 15% O <sub>2</sub>	
Basis of monitoring: It is widely practiced and accepted to calibrate and use a portable analyzer or NO <sub>x</sub> CEMS/PEMS to measure NO <sub>x</sub> concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NO <sub>x</sub> concentration is provided as a monitoring option for any control device because an increase in NO <sub>x</sub> concentration may be indicative of the control device performance. Outlet NO <sub>x</sub> concentration has been used as an indicator in many federal and state rules.	

<b>Unit/Group/Process Information</b>	
ID No.: CENTAUR-2B	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO <sub>x</sub>	Main Standard: § 60.332(a)(2)
<b>Monitoring Information</b>	
Indicator: NO <sub>x</sub> Concentration	
Minimum Frequency: Monthly - 4 consecutive months with no deviations, then; Semiannually - 2 monitoring periods with no deviations (monthly monitoring resumes if a deviation is noted), then; Annually (monthly monitoring resumes if a deviation is noted).	
Averaging Period: N/A	
Deviation Limit: NO <sub>x</sub> > 165 ppmvd at 15% O <sub>2</sub>	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to calibrate and use a portable analyzer or NO<sub>x</sub> CEMS/PEMS to measure NO<sub>x</sub> concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NO<sub>x</sub> concentration is provided as a monitoring option for any control device because an increase in NO<sub>x</sub> concentration may be indicative of the control device performance. Outlet NO<sub>x</sub> concentration has been used as an indicator in many federal and state rules.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: FLARE 70	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-002
Pollutant: Opacity	Main Standard: § 111.111(a)(4)(A)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: If visible emissions are observed the permit holder shall either report a deviation or determine visible emissions consistent with Test Method 22 or Test Method 9.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor flares for visible emissions by closed circuit cameras and visual inspection. Visible emissions observations indicate that the flare is not efficiently combusting the emissions or there is incomplete combustion. Visible emissions can indicate an improper inlet flow rate or net heating value of the emissions routed to the flare. Monitoring visible emissions is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart A; 30 TAC Chapter 111; and 30 TAC Chapter 115. This procedure is consistent with the EPA "CAM Technical Document" (August 1998) which provides an example of using "EPA Test Method 22-like" procedures for determining visible emissions.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: SATURN-4B	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO <sub>x</sub>	Main Standard: § 60.332(a)(2)
<b>Monitoring Information</b>	
Indicator: NO <sub>x</sub> Concentration	
Minimum Frequency: Monthly - 4 consecutive months with no deviations, then; Semiannually - 2 monitoring periods with no deviations (monthly monitoring resumes if a deviation is noted), then; Annually (monthly monitoring resumes if a deviation is noted).	
Averaging Period: N/A	
Deviation Limit: NO <sub>x</sub> > 150 ppmvd at 15% O <sub>2</sub>	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to calibrate and use a portable analyzer or NO<sub>x</sub> CEMS/PEMS to measure NO<sub>x</sub> concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NO<sub>x</sub> concentration is provided as a monitoring option for any control device because an increase in NO<sub>x</sub> concentration may be indicative of the control device performance. Outlet NO<sub>x</sub> concentration has been used as an indicator in many federal and state rules.</p>	

## Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at [https://www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

[https://www.tceq.texas.gov/permitting/air/permitbyrule/air\\_pbr\\_index.html](https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html)

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Historical Standard Exemption lists may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

Additional information concerning PBRs is available on the TCEQ website:

[https://www.tceq.texas.gov/permitting/air/nav/air\\_pbr.html](https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html)

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 03/04/2019.

Site rating: 0.40 / Satisfactory Company rating: 1.76 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes  
OP-UA14 - Water Separator Attributes  
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes  
OP-UA16 - Solvent Degreasing Machine Attributes  
OP-UA17 - Distillation Unit Attributes  
OP-UA18 - Surface Coating Operations Attributes  
OP-UA19 - Wastewater Unit Attributes  
OP-UA20 - Asphalt Operations Attributes  
OP-UA21 - Grain Elevator Attributes  
OP-UA22 - Printing Attributes  
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes  
OP-UA25 - Synthetic Fiber Production Attributes  
OP-UA26 - Electroplating and Anodizing Unit Attributes  
OP-UA27 - Nitric Acid Manufacturing Attributes  
OP-UA28 - Polymer Manufacturing Attributes  
OP-UA29 - Glass Manufacturing Unit Attributes  
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes  
OP-UA31 - Lead Smelting Attributes  
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes  
OP-UA33 - Metallic Mineral Processing Plant Attributes  
OP-UA34 - Pharmaceutical Manufacturing  
OP-UA35 - Incinerator Attributes  
OP-UA36 - Steel Plant Unit Attributes  
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes  
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes  
OP-UA39 - Sterilization Source Attributes  
OP-UA40 - Ferroalloy Production Facility Attributes  
OP-UA41 - Dry Cleaning Facility Attributes  
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes  
OP-UA43 - Sulfuric Acid Production Attributes  
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes